

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Emoji Company GmbH

Plaintiff,

v.

The Individuals, Corporations, Limited  
Liability Companies, Partnerships, and  
Unincorporated Associations Identified on  
Schedule A Hereto

Defendants.

Case No.: 1: 23-cv-01112

Judge John F. Kness

Magistrate Judge Young B. Kim

**DECLARATION OF KUNHUO GONG IN SUPPORT OF DEFENDANT  
XIAMEN HAILUN TRADING CO., LTD.'S MOTION TO DISMISS THE COMPLAINT**

I, Kunhuo Gong, declare as follows:

1. I am a representative of Defendant Xiamen Hailun Trading Co., Ltd. ("Hailun Trading") in the above-captioned lawsuit.

2. I submit this declaration in support of Hailun Trading's Motion to Dismiss the Complaint for Lack of Personal Jurisdiction.

3. Hailun Trading conducts its business on [www.alibaba.com](http://www.alibaba.com) only.

4. Hailun Trading's sole place of business has always been in the City of Xiamen, Fujian Province, the People's Republic of China.

5. Hailun Trading never owns, rents, or possesses any property in Illinois or in other states of the United States.

6. Hailun Trading has never had directors, officers, employees, sales representatives, agents, distributors, or retailers in Illinois, or anywhere in the United States.

7. Hailun Trading has never maintained a bank account in the United States, including Illinois.

8. The product with ID 1600550567705 previously listed by Hailun Trading on its storefront is the only product that Plaintiff alleges to be infringing (the “Product”).

9. Hailun Trading never sold the Product.

10. Hailun Trading merely displayed its products, including the Product, on its storefront, but never specifically marketed, advertised, or otherwise promoted its products in the U.S. in general, or the State of Illinois in particular.

Pursuant to 28 USC §1746(1), I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 21, 2023

/s/ Kunhuo Gong  
Kunhuo Gong